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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

AHMAD MUKHTAR FAIZI, AN  
INDIVIDUAL AND DERIVATIVELY ON  
BEHALF OF FALAFEL FLAME INC.,

Plaintiffs,

vs.

BAKTASH TEMORI, et al.

Defendants.

Case No.: 22-cv-04224-VKD

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S APPLICATION FOR A  
AN ORDER TO SHOW CAUSE WHY  
DEFENDANTS SHOULD NOT BE HELD  
IN CONTEMPT OF COURT**

14 Before the Court is Plaintiff Ahmad Mukhtar Faizi, an individual and derivatively on behalf  
15 of Falafel Flame, Inc.'s ("Falafel Flame Inc." or "Plaintiff") Application for an Order to Show Cause  
16 why defendants should not be held in contempt of court.

17 Having considered the application and its supporting documents, the Court hereby orders as  
18 follows:

19 **IT IS HEREBY ORDERED** that Defendants shall appear before this Court on August  
20 15, 2023, at 10:00 a.m., to show cause, if there is any, (1) why this Court should not hold  
21 defendants in contempt of the Injunction Order, (2) why this Court should not hold defendants in  
22 contempt of the Contempt Order, (3) why this Court should not hold defendants in contempt of the  
23 Attorneys Fees Order and (4) why sanctions in the form of the disgorgement of Unapproved  
24 Falafel Restaurants' profits realized during the period of contempt should not be imposed.

25 **IT IS FURTHER ORDERED** that Defendants shall inform all owners of  
26 Unapproved Falafel Restaurants not already named in this lawsuit to appear at the above hearing.

27 **IT IS FURTHER ORDERED** that Plaintiff is entitled to an award of attorneys' fees, in  
28 an amount according to proof.

1       **IT IS FURTHER ORDERED** that each Defendant shall submit a sworn affidavit  
2 describing their efforts at compliance within ten (10) days from the date of this order.

3       **IT IS FURTHER ORDERED** that each day Director Defendants and Unapproved Falafel  
4 Restaurants continue to fail to comply with the Order, they shall pay fines to the Plaintiff on the  
5 following schedule:

- 6           1. For violating the Injunction Order, \$100 per day per Unapproved Falafel Defendant,  
7           to be increased by an additional \$100 every seven days until Defendants can  
8           demonstrate compliance.
- 9           2. For violating the Contempt Order, \$100 per day until Defendants can demonstrate  
10          compliance.
- 11          3. For violating the Attorney's Fees Order, \$100 per day until Defendants can  
12          demonstrate compliance.

13  
14       **IT IS SO ORDERED.**

15  
16 Dated:

17 \_\_\_\_\_  
18 VIRGINIA K. DEMARCHI

19 MAGISTRATE JUDGE OF THE UNITED STATES DISTRICT  
20 COURT